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**UNITED STATES DISTRICT COURT
 DISTRICT OF NEW JERSEY**

WORD APE, LLC d/b/a CHOMCHOM	:	Document Filed Electronically
ROLLER,	:	
	:	
	:	Civil Action No. 21-14431-MCA-MAH
Plaintiff,	:	
v.	:	Madeline Cox Arleo, U.S.D.J.
	:	Michael A. Hammer, U.S.M.J.
	:	
ONTEL PRODUCTS CORPORATION and	:	
LING FUN TRADING, LTD.,	:	
	:	
Defendants.	:	
	x	

**PLAINTIFF'S NOTICE OF MOTION TO
 DISMISS DEFENDANTS' AMENDED COUNTERCLAIMS**

PLEASE TAKE NOTICE THAT on December 6, 2021, at 10:30 a.m., at the Martin Luther King, Jr. Federal Building and Courthouse, 50 Walnut Street, Newark, New Jersey, or as soon thereafter as counsel may be heard, Plaintiff Word Ape, LLC d/b/a ChomChom Roller ("ChomChom"), through its attorneys, will move before The Honorable Madeline Cox Arleo, for an order, pursuant to Fed. R. Civ. P. 12(b)(6), to dismiss the three counterclaims: (1) tortious interference with contract; (2) tortious interference with prospective economic benefit; and (3) unjust enrichment, which were filed on September 23, 2021. (ECF No. 16, at 13-16.) Support

for ChomChom's motion is included within its accompanying memorandum in support of its motion.

Respectfully submitted,

LERNER, DAVID, LITTENBERG,
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*Attorneys for Plaintiff Word Ape,
LLC d/b/a ChomChom Roller*

Dated: October 28, 2021

By: s/ Aaron S. Eckenthal
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